# PERFORMANCE PARTNERSHIP AGREEMENT (PPA) FY 04 Between

## THE UTAH DIVISION OF DRINKING WATER (STATE) And

## REGION 8 U.S. ENVIRONMENTAL PROTECTION AGENCY July 2003

#### **Preamble**

This is a performance partnership agreement between the Utah Division of Drinking Water hereinafter referred to as "State" and the Drinking Water Program within the Environmental Protection Agency's Region 8 office, hereinafter known as "EPA". The purpose of this agreement is to ensure, to EPA's satisfaction, that the delegated drinking water programs are satisfactorily administered.

## **Maintain Core Programs**

The State will maintain and implement the core programs, as required by federal and state statutes and rules, and as reflected in program authorizations and other formal agreements.

## **Maintain National Databases**

The State commits to properly transfer data into regional and national data systems, where federally required data fields are kept current, and that the data is entered accurately and pursuant to definitions and policy. The State commits to maintain its database and assist, when requested to do so, those responsible for the national database. This includes data entry, quality assurance and data validation for assuring timely and complete updating of information for the purpose of data retrieval by EPA staff and managers.

The State commits to transmit water system inventory information, bacteriologic and SWTR violation and enforcement data to SDWIS within 45 days after the end of each calendar quarter. Further, the State commits to transmit violation and enforcement data for the Lead/Copper Rule, the Phase II/IV Rules and the Radionuclide Rule covering the calendar year of 2003 by May 3, 2004.

EPA will provide the state with the initial lead/copper monitoring lists no later than August 15, 2003, and the State will, by November 15<sup>th</sup>, review the systems appearing on the list and commence enforcement actions or note that they've returned to compliance in SDWIS. In FY 2004, SNCs will be determined for Lead and Copper, and any water systems remaining in violation will become State enforcement candidates.

By January 1, 2005, State will ensure that 100% (20% per year) of data for all NTNCWSs includes lat/long data (with mad code data) in the SDWIS inventory. Any CWSs lacking mad code data, should already have been corrected.

For systems identified on the SNC lists, the State will look at all the violation and submit SDWIS "return to compliance" information where applicable.

## **Implementing New EPA Rules**

State will ensure violations of EPA and State regulations implementing Radionuclides, etc. are reported to SDWIS the quarter after occurrence. When final guidance is issued, The State will start working on implementing reporting requirements.

EPA Region 8 will provide information/instructions and/or documentation specific to the new codes used to report compliance assistance visits (a new code under sanitary surveys) and the State will report these visits as well as Sanitary Surveys on a quarterly basis to SDWIS. The State will also use the new SDWIS code to report follow-up visits for formal enforcement as they occur.

If the State does not have an approved primacy package for any new rule (arsenic, LT1 and Filter Backwash), the State commits, for rules that are enforceable by EPA, to provide EPA a list of violators within 60 days of identifying noncompliance. If EPA does not provide feedback on new primacy packages within 90 days of receipt, the State will assume that primacy has been granted and will proceed accordingly.

## TCR/SWTR

The State commits to consider conducting Sanitary Surveys and/or technical assistance visits (with written reports) at all sources which are SNCs, including those which are SNCs for microbial quality violations, as resources allow.

The State will provide to EPA an updated list of all systems that are required to filter under the SWTR, but are not yet filtering. Additionally, the State will report those violations to SDWIS-Fed. For those still on compliance schedules, the State will provide the schedule from the enforcement document to EPA. If any systems are not under compliance schedules, the State will provide for each system a rationale and the proposed state action and time frame for securing an enforceable compliance schedule.

The State will identify any additional actions and the time frames for completing assessments of groundwater under the influence of surface water, and the systems for which such assessments need to be completed.

## Safe Drinking Water Act Enforcement

The State commits to annotating the quarterly SNC lists, and will return the annotations to EPA within 30 days of receipt of the list and periodically thereafter as appropriate.

The State commits to either a) conduct formal enforcement, as appropriate, or b) refer the system to EPA for enforcement on all unresolved SNCs within 6 months of becoming identified as an SNC.

On April 16, 2003 EPA issued to each State a "List of Systems with a History of Significant Non-compliance". This list includes all systems with violations for at least three quarters over a three-year period. EPA will be tracking those systems' compliance, and will identify to the State those systems that have continued to have violations. Systems with continuing violations will be candidates for work share between EPA and the State.

The State commits to providing EPA a copy of all settlement agreements for systems identified as SNC's, both administrative and judicial, including penalty calculations (documenting gravity and economic benefit calculations) and any penalty justifications. These will be provided no later than October 31, 2003.

The State commits to reviewing and revising State enforcement escalation policies to ensure enforcement actions occur before a system becomes a SNCs, the policies address all types of violations relating to EPA's regulations, and provide a response to these violations. The State should provide its enforcement escalation policies to EPA by July 1, 2004 and collaborate with EPA in making any necessary revisions to the policies. This would include updating the State IPS to include SWTR, including GUI failure to filter, violations.

## Safe Drinking Water Enforcement Oversight

The State agrees that EPA will use the new version of the Uniform Enforcement Oversight System (UEOS) for evaluating the State's enforcement performance for FY 2004. The State will be given the opportunity to reconcile the national database information and review a draft report of the assessment before the enforcement evaluation is finalized for FY 2004.

The State shall provide EPA a list of the sanitary surveys that the State plans to perform in the State Fiscal year and calendar year 2004. The State list should include at least 20% of community groundwater, non-community groundwater without disinfection and non-community surface water systems; 10% of non-community groundwater systems with disinfection; and 33.3% of community surface water systems some unplanned surveys may be necessary for violation follow-up. The State commits to a goal of completing sanitary survey reports within 90 days of completion of fieldwork. The State agrees to provide copies of up to 25 sanitary survey reports after the end of the State FY, for the purpose of conducting the uniform enforcement state oversight evaluation.

> Signed: Kevin W. Brown Date: August 29, 2003 Utah Division of Drinking Water

## DEPARTMENT OF ENVIRONMENTAL QUALITY

## DIVISION OF DRINKING WATER FY 2004 GOALS

#### **MISSION STATEMENT:**

To protect the public against waterborne health risks through education, assistance, and oversight.

## **ENVIRONMENT**

## **DEQ STRATEGIC GOAL**

Establish clear, implementable criteria that define excellence in environmental quality, including standards for air, water, and soil, and for activities in pollution prevention, clean-ups, emissions reductions, public education and cost effectiveness of controls.

## Measures:

- a. Necessary statutes, rules, and guidelines exist.
- b. Regulated customers understand and follow criteria.
- c The non-regulated customers perceive DEQ programs as fair and protective of health and the environment.

Promote a sustainable relationship between economic development and environmental quality.

## Measures:

- a. Stakeholders participate in the development and implementation of environmental policies and programs.
- b. Over time, evaluate environmental data in relation to economic improvements within the region.

Provide leadership in Utah, the western region, and nationally on environmental policy and protection.

- a. Evaluate the results of DEQ participation in targeted state, regional and national policy and regulatory discussions. Identify objectives of participation and achievement of objects.
- b. Success of legislative, budget, and policy initiatives identified and supported by DEQ.

#### DDW STRATEGIC GOAL

To maintain superior drinking water quality and meet the current and future water demand through ensuring adequate facilities, source protection, Safe Drinking Water Act (SDWA) implementation, timely assistance, and incorporate Utah needs into national policy. Our ultimate goal is to have zero Not Approved public water systems.

## **Measures:**

- a. Percentage of community water systems with approved ratings.
- b. Percentage of population served with approved ratings.
- c. Number of completed source protection plans implemented by drinking water systems.
- d. Percent of population and community water systems with ground water or surface water protection programs.
- e. Number of percentage of community water systems (and population served) with one or more violations of health-based requirements during the year, reported separately for violations of the SWTR, TCR, Nitrate, Lead and Copper Rule, and all other regulated contaminants.
- f. Percent of community and non-transient, non-community water systems (and population served with lead levels in drinking water exceeding the action level in the Lead and Copper regulation.
- g. Number of unfiltered systems not in compliance with SWTR requirements and population served.

## **DDW Annual Goals**

1. Complete, maintain and enhance the TRITON database.

- a. Complete and deploy to all DDW staff, the first version of TRITON (the version replacing all DMAC functionality and including the Bacti, Inventory and Chem and Enforcement modules along with their associated Actuate and EPA reports.) by 7/30/2003.
- b. Completely migrate all DMAC and DAD data to TRITON. Officially retire and cease using DMAC and much/most of DAD (some of DAD which contains functionality not in TRITON will need to continue) by 10/31/2003.
- c. Complete the Priority A Group of Enhancements/Additions to Triton and make them a functional part of Triton. These enhancements are:

Surface Water Treatment Rule (1), Interim Enhanced SWTR (1), DBP Rule (1), MCL exceedances - tracking of follow-up actions (2), Bacti electronic data transfer (3), Public Notification - expansion on Enforcement (4), and CCR (5) by 6/30/2004. (The numbers in parentheses behind each item indicate it's relative priority.)

- d. Complete and deploy as many "Priority B Enhancements" to Triton as time allows. These enhancements include: electronic data transfer from labs to DDW, help system for Triton, fully unit/jemmy/jelly test Triton, break business objects out to EA Server, Web version of Triton, Java and database documentation, expanded Sanitary Survey module, new source review, source protection, UCMR, other new EPA rules (Ground Water, Radon), plan review tracking, library, hydrogeology library, GWUDI, CAP meeting assignments tracking, loan program, charting by 6/30/2004.
- e. Maintain the TRITON database. Fix bugs as they are discovered and make any changes to TRITON necessitated by changes in DDW's needs, rules or procedures by 6/30/2004.
- 2. Determine the impacts of secondary irrigation systems on public drinking water systems and Utah's residents and develop guidance to mitigate any adverse impacts discovered by the investigation. CPM E1

- a. With the DWB develop a strategy for the investigation, considering previous work and the need to involve a broad spectrum of professionals and lay public interested in drinking water by 9/30/2003.
- b. Perform the investigative piece of the strategy by, among other things, evaluating the drinking water quality in those areas served by secondary irrigation systems, the incidents of cross-connections and the robustness of local cross-connection programs, and to the extent possible determine the incidence of gastro-intestinal illnesses by 12/31/2003.
- c. With the DWB and its advisors evaluate the results of the investigation carried out in task 2.b., identify the characteristics of those drinking water systems which maintain acceptable water quality during the irrigation season and the characteristics of those systems for which the water quality deteriorates and, in a similar fashion the incidence of gastro-intestinal illnesses. Prepare a report for the DWB's consideration which contains recommendations for mitigating adverse impact on drinking water systems by secondary irrigation systems by 3/31/2004.
- d. Implement any decision by the DWB regarding Task 2.c. (above) report findings and recommendation(s) by 6/30/2004.

3. Create an external ad hoc Board committee to investigate: DDW's best approach (including rules/construction standards) to address increased concerns about water system security and how best to participate/coordinate with security efforts outside of DDW.

#### Measures:

- a. The Compliance Section will advise the Engineering Section of DDW/RWAU training efforts directed towards large and medium systems to comply with the EPA mandate to prepare VA's and ERP's by 5/5/2003.
- b. The Engineering Section will prepare a recommendation to the Drinking Water Board that would identify issues and identify ad hoc committee by 7/31/2003.
- c. The Engineering & Compliance Sections will jointly present the recommendations of the ad hoc committee to the Board by 6/30/2004.
- 4. Overhaul the Operating Permit process, as necessary, so that it more nearly fulfills its original concept.

#### Measures:

- a. Investigate why there are so many projects without an operating permit and recommend revisions to the process to minimize this number by 9/30/2003.
- b. Revise DAD to allow each engineer to update the plan review tracking file in a manner to implement the findings and recommendations of task 4.a. by 12/31/2003.
- 5. Form a Sanitary Survey QAT to evaluate and make recommendations to management on issues relating to Sanitary Surveys, including, but not limited to: a) manager tracking of staff performance, b) survey data capture and interface with the Triton based IPS system, c) necessary assignments to complete the required number of surveys, d) digital helps to facilitate staff work, e) sanitary survey kits, f) survey training, and g) period of performance of surveys.

- a. Division management will meet to: a) develop a direction statement or "charge" for the QAT, b) assign staff to the QAT, c) appoint a leader for the QAT and d) provide a timeline for tasks completions by 7/1/2003.
- b. The QAT will obtain data, formulate and evaluate options, and make recommendations to the Division management. by 10/1/2003.
- c. Division management will implement recommendations as appropriate by 12/1/2003.

6. Communicate effectively with water treatment plant staff

## **Measures:**

- a. Define types of interaction with the treatment plants; i.e., treatment plant inspection, sanitary survey, comprehensive performance evaluation, and comprehensive technical assistance. Describe who makes the contact, at what frequency and documentation needed by 8/31/2003.
- b. Improve knowledge and skills related to treatment plant interactions. Obtain and study implementation guidelines and handbooks. Attend training and provide training to other staff by 10/31/2003.
- c. Interact constructively with the treatment plants as defined in Task 6.a. Meet goals for quality and frequency of visits by 12/31/2003.

## **CUSTOMER SERVICE**

## **DEQ STRATEGIC GOAL**

Operate as a customer-oriented agency by focusing on customer service, trust and problem-solving through teamwork and partnership.

## **Measures:**

- a. Make timely decisions.
- b. Improve coordination with internal and external customers.
- c. Provide effective communication, timely information and clear direction to customers.
- d. Encourage public involvement and informed decision-making.
- e. Involve customers in the rulemaking process.
- f. Work in partnership to solve problems.

## **DDW STRATEGIC GOAL**

Maintain an atmosphere of trust between the Division and the Divisions customers through timely, accurate and courteous exchanges of information.

- a. Customer feedback to Department and Division.
- b. Meet established review or response periods.

## **DDW Annual Goals**

7. Provide Opportunity for Customer Feedback.

#### **Measures:**

- a. Provide survey at AWWA-Intermountain Section fall conference by 9/30/2003.
- b. Provide survey at RWAU summer conference by 7/31/2003.

## STATE BASED REGULATION OF ENVIRONMENTAL PROGRAMS

## **DEQ STRATEGIC GOAL**

Administer programs and priorities to reflect the unique conditions of Utah. Programs will be administered at the state or local level, wherever appropriate. Actively influence non-delegated federal programs to reflect Utah needs.

- a. Primacy is achieved and maintained in those environmental program areas in which it is determined to be in the best interest of the state to receive federal primacy.
- b. Utah Issues and DEQ concerns are reflected in state, regional and national environmental policies.

#### DDW STRATEGIC GOAL

Administer programs and priorities to reflect the unique conditions of Utah. Programs will be administered at the state or local level, whenever appropriate. Actively influence non-delegated federal programs to reflect Utah needs.

## **DDW Annual Goals**

8. Upgrade the IPS rule to incorporate missing issues, including but not limited to: UDI, engineering elements, CCR's and the SWTR and DBP suite of rules.

- a. Compliance Section team will meet and identify issues needing inclusion into the IPS rule by 9/1/2003.
- b. Rule revisions will be presented to the Board at its October or November meeting by 11/30/2003.
- c. The revised rules will be incorporated into the Triton database; sanitary survey forms and training; and CAP and rating calculations by 6/30/2004.
- 9. Update Engineering rules as needed.

## Measures:

- a. Update Rule R309-204 and change its designation to R309-515 by 10/31/2003.
- b. Review rules R309-500 550 and update references and other material as needed by 10/31/2003.
- c. Revise R309-520-14 Ultraviolet Light as needed to bring it into conformance with accepted contemporary practice by 3/31/2004.
- 10. Develop a tracking mechanism and improve the follow-up of assignments given at the quarterly CAP meetings.

#### Measures:

- a. The Compliance Section will explore tracking options at its August 12, 2003 CAP meeting by 8/12/2003.
- b. The Compliance Section will implement the selected option by its November 12, 2003 CAP meeting and the Compliance Section Manager will advise the Section Managers of the Engineering and Special Services Sections of assignments give for purposes of tracking and reporting by 11/12/2003.
- c. All future CAP meetings following the November 12th meeting will include status reports on completion of assigned CAP tasks by 6/30/2004.

## **PARTNERSHIP WITH ALL GOVERNMENT AGENCIES**

## **DEQ STRATEGIC GOAL**

Administer programs and priorities to reflect the unique conditions of Utah. Programs will be administered at the state or local level, wherever appropriate. Actively influence non-delegated federal programs to reflect Utah needs.

- a. Primacy is achieved and maintained in those environmental program areas in which it is determined to be in the best interest of the state to receive federal primacy.
- b. Utah Issues and DEQ concerns are reflected in state, regional and national environmental policies.

#### DDW STRATEGIC GOAL

Administer program and priorities to reflect the unique conditions of Utah. Programs will be administered at the state or local, whenever appropriate. Actively influence non-delegated federal programs to reflect Utah needs.

## **DDW Annual Goals**

11. Develop, in cooperation with EPA, a Performance Partnership Agreement for the federal fiscal year commencing October 1, 2003.

## **Measures:**

- a. The Compliance Section Manager will seek guidance and examples from EPA and prepare a draft PPA by 7/15/2003.
- b. The Compliance Section Manager will incorporate input from EPA and prepare a final PPA by 9/1/2003.
- 12. The Division of Drinking Water will work with the State Health Laboratory to: a) improve upon the completeness and timeliness of reporting: IOC, VOC, Pesticide and Radionuclide data, b) encourage the Bureau of Laboratory Improvement to incorporate a rule requiring certified bacteriologic laboratories to automatically forward data to DDW and the appropriate local health department and c) encourage where ever possible the electronic reporting of data by all certified laboratories.

#### Measures:

a. DDW will continue to attend the monthly DEQ/DOH laboratory coordination meeting and as appropriate, bring up the issues identified above by 6/30/2004.

## **Employees**

## **DEQ STRATEGIC GOAL**

The success of the employees determines the success of DEQ. We will maintain a climate and structure in which employees can function to their fullest potential and accomplish the strategic goals of DEQ.

- a. Employee participation in achieving strategic and annual goals is essential.
- b. Teamwork and problem solving in essential.
- c. Employees are recognized for their quality work.
- d. Provide opportunities for training and professional development.

- e. Employee = feedback.
- f. Individual performance standards reflect annual goals and performance reviews are based on those performance standards.
- g. Employees statements and actions reflect strategic and annual goals and DEQ policies and procedures.
- h. Employee recognition programs are in place, utilized and meet employee and management needs.

## **DDW STRATEGIC GOAL**

The success of the employees determines the success of the DEQ. We will maintain a climate and structure in which employees can function to their fullest potential and accomplish the strategic goals of DEQ.

#### **Measures:**

- a. Employee ≠ assessment of job assignments.
- b. Employee-s assessment of program direction.
- c. Implement and maintain successful Quality Recognition Program.

## **DDW Annual Goals**

13. Investigate electronic document management systems.

#### **Measures:**

- a. Organize a QAT and provide it with objectives to accomplish by 8/15/2003.
- b. The QAT is to investigate the various forms of electronic data management, associated costs and ease of implementing within DEQ's IT framework and prepare and present a report of its findings as directed by the Division's management team by 12/31/2003.
- 14. Perform File Purge.

- a. Develop written instructions for employees to follow when purging files by 7/31/2003.
- b. Allocate files to all DDW employees to be purged by 8/31/2003.
- c. Complete file purge process by 1/1/2004.

15. Provide Technical Training Opportunities and Raise Awareness to Upper Management.

#### Measures:

- a. Brief Executive Director and Deputy Director of technical training needs during budget process by 6/30/2003.
- b. Prioritize out of state travel (\$16,000) to best meet technical training needs by 6/30/2003.
- c. Seek external funding opportunities to help cover travel costs by 6/30/2004.
- d. Seek onsite technical training opportunities (with consultants, suppliers, water systems) by 6/30/2004.
- e. Identify issue in annual report by 6/30/2004.

## **Enhance Policy Maker's Understanding**

## **DEQ STRATEGIC GOAL**

Facilitate Board members as proactive participants in shaping environmental policy.

## **Measures:**

- a. Board members receive necessary information.
- b. Members participate in policy development and implementation.

## **DDW Annual Goals**

16. Complete a Division Annual Report.

## **Measures:**

- a. Complete calendar year 2003 report by 2/15/2004.
- 17. Working with the other state agencies requiring water conservation and management plans establish a list of drinking water systems that have adopted a water management and conservation plan, update it as necessary and prepare an outline of the issues that should be included in such a plan.

#### Measures:

a. Obtain from Water Resources, Community Development, and Water Resources a list of those drinking water systems that have adopted a water management and conservation plan by 7/31/2003.

- b. Prepare an outline of issues that should be included in a water management and conservation plan starting with Water Resource's outline, allow each state agency to review it and publish it for use by interested parties including the Drinking Water by 2/28/2004.
- c. Periodically, update the water management and conservation plan list by contacting each participating agency for any additions, add to the list as necessary and send the updated list to each by 5/31/2004.
- 18. Meet With New Deputy Director and Discuss Division Priorities.

## **Measures:**

- a. Meet with Deputy Director and executive Director by 8/30/2003.
- b. Brief Drinking Water board in June/August meeting by 8/30/2003.
- c. Utilize external agencies (RWAU, AWWA-Intermountain Section) to help carry message to ED and DD by 6/30/2004.
- 19. Enhance information presentation to the Drinking Water Board.

- a. Survey Board asking for feedback on how to improve written and oral communications by 7/31/2003.
- b. Conduct Board work meeting(s) to address policy issues by 8/31/2003.
- c. Convene Board workgroup to discuss by 9/15/2003.
- d. Implement improvements by 10/31/2003.

Division of Dri		
Category	Activity	Responsibility
Philosophy, Culture	Customer service oriented Implementation of DEQ Operating principles	All All
	Actively seek feedback from our customers	All
	Maintain good communication and partnerships with all of DDW's customers	All
	Effective inter-section communication	All
Staff	Ensure staff are technically trained to accomplish mission	All

	Reward and recognize employees for excellent work	All
	Serve on national and state committees	All
	Employee job ownership/employee empowerment	All
	Secretaries forward calls to the proper staff member or	All
	agency	
IT, Gov e-business	Internet homepage maintenance	All
	SDWIS data reporting	Compliance
	DMAC database	Compliance
	Automate water treatment plant report transmission	Engineering
	DAD development and maintenance	Engineering
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	legal control of the	On a sint Compine
		Special Services
	applications	On a sial Com day
	Triton database development and maintainance	Special Services
	IT steering committee	Special Services
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Assistance Training	Staff assistance to Drinking Water Board	All
	Technical assistance to water operators	All
	General partnering (targeted training, cooperative followup, planning)	All
	Educate locally elected officials and their staff	All
	Water quality problems, technical assistance	All
	Perform feasibility studies	Engineering
	Support for Permanent Community Impact Board	Engineering
	Technical assistance to water treatment plants	Special Services
	Support local water quality alliances (also assigned to Special Services)	Engineering
	State water plan coordination	Engineering
Division of Dri	nking Water - FY 04 Core Activities	
Dividion of Dir	Thirting victor 1 1 0+ 0010 Activities	
Cotogony	Activity	Poononoihility
Category	Activity  Training on capacity development and it's issues to	Responsibility
	consultants, district engineers, others	Engineening
	Ensure Drinking Water Board members have sufficient	ΔII
	training to make policy decisions	
	training to make policy dedictions	
Field Work	Sanitary survey scheduling, performance, training and	Compliance
I IEIU VVOIK	data entry	Compliance
	Water treatment plant inspections	Engineering
	Construction inspections	Engineering
	Develop and obtain additional useful spatial data	All
	Special studies on water treatment techniques	Special Services / Engineering

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Regulatory	Write, implement and revise rules as needed	All
regulatory	New Source operating permits	All
	Enforcement (AOs, BCAs, AG Referrals, Administrative	
	Hearings, Administrative Penalties, etc.)	
	Properly follow-up on assignments made at the Division's quarterly CAP meetings	All
	Unified Enforcement Oversite System	All
	EPA annual compliance reporting	Compliance
	Improvement Priority System	Compliance
	Utah will implement appropriate prevention and enforcement actions on SNC and Not-approved systems	Compliance
	Public Notice	Compliance
	Consumer Confidence Reports	Compliance
	Report every three years on assistance to significant non-compliers from capacity development program	
	Quarterly SNC list annotated and back to EPA within 30 days	Compliance
	Copy EPA with enforcement action	All
	Monitoring and MCL Compliance tracking and reporting	Compliance
	Plan reviews / Operating Permits	Engineering
	Grout Witnesses	Engineering
	Surface Water Treatment Rule tracking and reporting (also GWUDISW)	Engineering Compliance
	Source protection program	Special Services
	Capacity review for new systems	Engineering
	Assure that sampling and reporting is being done in a professional, timely and truthful manner.	Compliance
<b>Division of Dri</b>	nking Water - FY 04 Core Activities	
Category	Activity  When EPA proposes a rule, we will study the impact, prepare appropriate comments, and encourage the affected PWSs to comment. Finalize each rule by developing an appropriate State Rule, and implement.	
Certification	Backflow Technician Certification	Compliance
	Operator Certification	Compliance
Financial Assistance	Financial assistance programs	Engineering
i manoiai Assistante	Capacity assessments for financial aid	Engineering
	Annual rates and needs survey	Engineering
	, animal rates and needs survey	199

	Consider obtaining needed information from TNC and NTNC systems in cooperation with Water Rights.	I Engineering
Misc	Emergency Response / System Security	Compliance
	Laboratory Coordination	Compliance
	Annual report	Engineering
	Support services (Purchasing, contracting, grants, travel budget preparation) budget/expenditure tracking, and financial reporting)	
	Support Board investigations on: Conservation secondary systems; system security; master planning requirements; State SRF to mutual systems; 1/16 % sales tax issue.	